

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Case No: 22-10558-JAD
	:	
Steven Charles Rodgers, Jr and	:	Chapter 13
Amanda Leigh Rodgers,	:	
Debtors,	:	
_____	:	Docket No: 13
Steven Charles Rodgers, Jr and	:	
Amanda Leigh Rodgers,	:	
Movants,	:	
	:	
vs.	:	
	:	
No Respondent,	:	
	:	
and	:	
	:	
Ronda J Winnecour, Esquire,	:	
Chapter 13 Trustee.	:	

**MOTION TO EXTEND DEADLINE REGARDING COMPLETION OF THE FILING OF CHAPTER  
13 PETITION, SCHEDULES, CHAPTER 13 PLAN PAYMENT AND PROOF OF INCOME**

**AND NOW** come the Debtors, Steven Charles Rodgers, Jr and Amanda Leigh Rodgers, by and through their attorney, Daniel P. Foster, Esquire, files the within Motion to Extend Deadline for the Filing of Chapter 13 Petition, Schedules and Proof of Income and in support of aver as follow:

1. The Debtors, Steven Charles Rodgers, Jr and Amanda Leigh Rodgers, are two adult individuals presently residing at 14888 Mackey Hill Road, Waterford PA 16441.
2. On December 14, 2022, the Debtors filed a petition under Chapter 13 of the Bankruptcy Code at the above-referenced case number. At that time, the Debtors filed an "Emergency Filing" and received a Notice of Deficiencies indicting that certain Schedules, Local Bankruptcy Form Number 1, Declaration RE: Electronic Filing, Statement of Financial Affairs, and Mailing Matrix were due by December 28, 2022.

3. The Debtors are aggressively obtaining additional information to submit to Counsel.
4. As a result of the above, Counsel for the Debtors have not been able to gather all the required information of said Debtors in a fashion to timely file completed schedules.
5. Counsel requests a reasonable extension of time to complete the Bankruptcy petition.
6. The Debtors needs approximately fourteen (14) days, or less, to obtain all the information necessary for the completion of the filing.
7. Counsel expects to file the completion no later than January 11, 2023.

Wherefore, the Debtors respectfully requests that this Honorable Court extend the time for the completion for fourteen (14) days.

Respectfully submitted,

Date: December 28, 2022

/s/ Daniel P. Foster, Esquire

Daniel P. Foster

PA I.D. # 92376

Foster Law Offices

1210 Park Avenue

Meadville, PA 16335

Phone: 814.724.1165

Fax: 814.724.1158

Email: [dan@mrdebtbuster.com](mailto:dan@mrdebtbuster.com)

Attorney for Debtors